

REMARKS

Applicants are in receipt of the Office Action mailed February 11, 2004. Claims 1 – 31 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(e) Rejection:

The Office Action rejected claims 1, 5, 7-10, 13-16, 18-21, 26, 27 and 31 under 35 U.S.C. § 102(e) as being anticipated by Schofield (U.S. Patent 6,263,485). Applicants respectfully traverse this rejection in light of the following remarks.

Schofield teaches a method for defining Interface Definition Language-defined data types, operations, or interfaces by generating an ASCII string descriptor that identifies the data type, interface, or operation. (Abstract). Specifically, Schofield teaches a code generator 112 operable to generate files in the language of the client and server applications, and to produce a Compact IDL Notation (CIN). (Col. 6, lines 23 – 51).

Regarding claim 1, contrary to the Examiner's assertion, Schofield fails to teach "a client generating a request for type information for an attribute or event, wherein the request is expressed in an interface definition language". Schofield teaches converting an original IDL description into new ASCII string descriptors that are "contained in a header file that is linked into both the client and server applications" (Schofield, column 3, lines 59-62, and column 11, lines 24-26). Further, Schofield teaches the benefits of using these ASCII strings instead of IDL to easily describe operations and data types (Schofield, column 4, lines 5-11). Thus, **Schofield teaches away** from using IDL to express a request for type information.

Furthermore, Applicants respectfully disagree with the Examiner's characterization of code generator 112 as an object request broker. As described above,

code generator 112 is operable to generate files in the language of the client and server applications, and to produce a Compact IDL notation as illustrated in Figs. 5 – 7 and described starting at col. 7, line 20. Contrary to the Examiner’s assertion, Applicants can find no language in Schofield that teaches or suggests **“a client generating a request for type information for an attribute or event”** and **“sending the request for type information to”** code generator 112.

Likewise, Applicants disagree with the Examiner’s characterization of server stub 87 from Fig. 4 as a metadata gateway. Schofield teaches that “The code generator 112 produces a client stub file 79 containing client stub functions and a server stub file 89 containing definitions for object implementations.” (Col. 6, lines 30 – 32). Applicants can find no language in Schofield that teaches or suggests server stub file 89 **“receiving the request for type information from the object request broker”**.

Further, Applicants disagree with the Examiner’s characterization of implementation library 81 from Fig. 4 as a metadata repository. Schofield clearly teaches that the implementation library includes executable code such as the client application and client stubs generated from the IDL specification of the object’s interface (Schofield, column 5, lines 55-59). Thus, contrary to the Examiner’s assertion, implementation library 81 contains client or server routines and does not store type information in a *database* format.

Schofield also fails to teach translating the type information from the database format to the interface definition language, as the Examiner contends. Schofield describes a method for generating a CIN (ASCII based) descriptor *from* an IDL data type (Schofield, column 7, lines 20-22). In fact, Schofield clearly illustrates this with an example where an ADD operation is translated from its IDL descriptor, “long Add (in long x, in long y);” to its equivalent CIN descriptor, “126861413+3+ADDA3+DFAFAF0+0+” (Schofield, column 10, lines 41-51). Hence, **Schofield teaches away** from translating the type information into the interface definition language.

Additionally, Applicants disagree with the Examiner's contention that Schofield teaches "the client receiving the translated type information for the attribute or event through the object request broker, wherein the translated type information is expressed in the interface definition language." As shown above, Schofield fails to teach translating type information into IDL. Thus, any **translated type information** in Schofield is **not in IDL**.

Applicants remind the Examiner that for a rejection under section 102, the identical invention must be shown in as complete detail as is contained in the claims. M.P.E.P 2131; *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The Examiner's rejection is clearly not supported by the teachings of the cited art. Thus, Applicants respectfully request withdrawal of the rejection.

Similar arguments apply in regard to the rejection of independent claims 10, 14, 22 and 27.

Section 103(a) Rejection:

The Office Action rejected claims 2-4, 6, 11, 12, 17, 23-25 and 28-30 under 35 U.S.C. § 103(a) as being unpatentable over Schofield in view of Kulkarni et al. (U.S. Patent 5,848,243) (hereinafter "Kulkarni"). Applicants respectfully submit that this rejection is improper for at least the reasons given above in regard to the rejection of the independent claims.

In regard to the rejections under both sections 102 & 103, Applicants also assert that the rejection of numerous ones of the dependent claims is further unsupported by the teachings of the cited art. However, since the rejection of the independent claims has

been shown to be improper, a further discussion of the rejection of the dependent claims is not necessary at this time.

Information Disclosure Statement:

Applicants note that an information disclosure statement was submitted electronically on November 12, 2003. Applicants respectfully request the Examiner to carefully consider the listed references and return a copy of the signed and initialed electronic submission from this statement.

CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above referenced application from becoming abandoned, Applicants hereby petition for such extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-46200/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Request for Approval of Drawing Changes
- ☐ Notice of Change of Address
- ☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$
for fees ().

Respectfully submitted,



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